

DECLARATION OF CHRISTOPHER JOHNSON

I, Christopher Johnson, Postal Inspector with the United States Postal Inspection Service (“USPIS”) do hereby declare:

Introduction and Agent Background

1. I have been a postal inspector with USPIS since April 2013. I am currently assigned to the Washington Division. My responsibilities include the investigation of the unlawful use of the U.S. Mail for criminal activity, including the transportation of contraband materials through the U.S. Mail. As part of my training and experience, I received twelve weeks of Basic Inspector Training in investigative techniques at the Career Development Unit located in Potomac, Maryland. My training consisted of various aspects of federal law enforcement including the investigation of narcotics-related offenses. I have participated in numerous interdictions and controlled deliveries related to narcotics investigations. I have also investigated and assisted in the investigation of many narcotics traffickers and possessors. Furthermore, in the course of assisting in past investigations, I have spoken with other postal inspectors who have substantial experience related to investigating schemes that utilize the U.S. Mail and the evidence that can be obtained as a result. If called upon, I can testify to the facts set forth in this declaration.

Purpose of This Declaration

2. This declaration is submitted in support of a complaint for forfeiture *in rem* of \$377,150.00 in U.S. Currency seized on or about April 20 and 23, 2018 from three U.S. Postal Service (“USPS”) Priority Mail parcels described herein.

3. I submit that there are sufficient facts to support a reasonable belief that the \$377,150.00 in U.S. Currency, constitutes (1) moneys furnished or intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds

traceable to such an exchange; or (3) moneys used or intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841 and thus is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

Summary of the Investigation

4. In August 2017, Washington Division postal inspectors were informed by Philadelphia Division postal inspectors of a parcel seizure in which one (1) kilogram of cocaine was addressed to a Lab Corps in Philadelphia. The return address on the parcel was 9909 Topanga Canyon Blvd., Chatsworth, CA 91311. Philadelphia Division postal inspectors provided an address in Owings Mills, Maryland that was receiving parcels with similar characteristics (return address, weight, and postage).

5. On April 16, 2018, Washington Division postal inspectors intercepted USPS Priority Mail parcels with tracking numbers 9505 5105 5306 8103 2204 91 ("Parcel 1"), 9505 5136 5563 8103 0711 19 ("Parcel 2"), and 9505 5107 0458 8103 2037 27 ("Parcel 3," and collectively with Parcels 1 and 2, the "SUBJECT PARCELS"). Parcel 1, Parcel 2, and Parcel 3 originated from post offices in Owings Mills, Randallstown and Windsor Mill, Maryland, respectively. The return addresses listed on the SUBJECT PARCELS were valid addresses in Owings Mills with fictitious names. The SUBJECT PARCELS were addressed to Smart Buy LLC, 9909 Topanga Canyon Blvd. #100, Chatsworth, CA 91311. This was the same address associated with the cocaine seizure by Philadelphia Division postal inspectors. Inspectors queried 9909 Topanga Canyon Blvd. #100, Chatsworth, CA and discovered the address is associated with a commercial mail receiving agency by the name PostNet.

6. On April 20, 2018, U.S. Magistrate Judge Beth P. Gesner authorized a federal search and seizure warrant (Misc. No. 18-1194-BPG) for the SUBJECT PARCELS. On April 20,

2018, the warrant was executed on Parcel 1 and Parcel 2 which contained \$120,990 and \$134,020 in U.S. currency, respectively. On April 23, 2018, the federal search warrant was executed on Parcel 3 which contained \$122,140 in U.S. Currency. All three of the SUBJECT PARCELS were packaged in a similar manner with packing peanuts and green saran wrapped bundles of U.S. currency, with the numbers "10" or "9" written on each bundle.

7. Postal inspectors were able to retrieve surveillance video from the Owings Mills and Randallstown, Maryland post offices. The surveillance videos show the same individual, later identified as Travis Reid ("REID"), mailing both parcels. There was no surveillance video available at the Windsor Mill post office.

8. In May 2018, Washington Division postal inspectors used postal databases to identify parcels mailed from the vicinity of Chatsworth, CA addressed to Owings Mills, MD with characteristics of narcotics parcels (*e.g.*, mailed from a narcotics source state, excessive postage paid in cash, invalid sender/return address). On May 2, 2018, Washington Division postal inspectors intercepted a USPS Priority Mail parcel with tracking number 9405 5102 0082 8726 6018 60 ("Parcel 4") mailed to Owen Miller, 4916 Rider Ct., Owings Mills, MD 21117. A search of public records databases revealed the address was valid but the name was fictitious. The return address on the parcel listed Pak & Ship All, Shipping Manager, 9420 Reseda Blvd. Ste 3, Northridge, CA 91324. Inspectors queried the address and discovered Pak & Ship All is a commercial mail receiving agency.

9. On May 3, U.S. Magistrate Judge Stephanie A. Gallagher authorized federal search and seizure warrant (Misc. No. 18-1333-SAG) for Parcel 4. On May, 7, 2018, the search warrant was executed on Parcel 4 which was found to contain 3,155 grams (3.155 kilograms) of a white powdery substance field tested positive for cocaine. Inspectors identified three additional parcels

destined for Owings Mills, MD mailed from Northridge, CA on the same date. All of the parcels had similar characteristics as Parcel 4 (*i.e.* weight, postage, etc.) and the mailing labels were all generated within a 30-minute window. Postal databases indicate one of the parcels was delivered and the other two never entered the mail stream. A search of postal databases identified that the same Internet Protocol (“IP”) address was associated with both the money parcels (Parcels 1, 2 and 3) and the cocaine parcel (Parcel 4). A federal grand jury subpoena was served on the service provider for the IP address and the subscriber was identified as REID at 8502 Fieldway Dr., Randallstown, MD 21133.

10. Postal Inspectors queried postal databases and identified approximately 18 suspected narcotics parcels mailed from Chatsworth, CA and Northridge, CA to Owings Mills, MD from December 2017 through September 2018. Inspectors also identified approximately 8 parcels suspected of containing U.S. currency mailed from the Owings Mills, MD area to Chatsworth, CA during the same time frame. Inspectors noticed that all of the parcels associated with the investigation originated or were destined to addresses on the same postal route assigned to USPS employee Grandville Priest II (“PRIEST”). Postal Inspectors also noticed incoming parcels suspected of containing narcotics were being scanned as “delivered” before PRIEST had departed the post office to make deliveries.

11. On September 14, 2018, inspectors identified USPS Priority Mail parcels with tracking numbers 9405 5102 0088 1839 9140 43 (“Parcel 5”) and 9405 5102 0079 3857 6736 69 (“Parcel 6”) addressed to Eden Evans, 4916 Riders Ct., Owings Mills, MD and O’Neil Richardson, 4831 Shellbark Rd., Owings Mills, MD, respectively. A search of public records databases revealed the addresses were valid but the names were fictitious. Both parcels had a return address listed as Pak & Ship All, Shipping Manager, 9420 Reseda Blvd. STE #3, Northridge, CA 91324.

On September 15, 2018, inspectors removed Parcel 5 and Parcel 6 from the mail stream. On September 16, 2018, inspectors reintroduced Parcel 5 and Parcel 6 back into the mail stream to assist with a surveillance operation.

12. On September 17, 2018, postal inspectors conducted surveillance of PRIEST on his assigned postal route. At approximately 8:30 AM, PRIEST was observed inside the post office looking through a hamper that contained parcels for his assigned route. At approximately 9:03 AM, PRIEST was observed taking a closer look at Parcel 5 and Parcel 6 before loading his postal vehicle. At approximately 2:13 PM, PRIEST was observed turning onto Dolfield Road in Owings Mills, Maryland but investigators could not maintain a visual on him. At approximately 2:15 PM, investigators observed a dark grey Toyota with tinted windows exit Parkers Farm Rd in the vicinity in which PRIEST was last seen. Investigators ran the Maryland registration plate on the Toyota, 6DE2417, and learned that it was registered to REID at 3103 Betlou James Place, Gwynn Oak, MD 21207. A subsequent search of USPS databases showed Parcel 5 and Parcel 6 were scanned delivered on September 17, 2018 at 1:59 PM when PRIEST was still at the post office.

13. Inspectors requested a federal grand jury subpoena to obtain call log records from REID and PRIEST's cell phone providers. Call log records revealed both REID and PRIEST were in contact with each other before and after the seizure of the \$377,150.00 in U.S. Currency from Parcels 1, 2 and 3 on April 20 and 23, 2018 and 3.155 kilograms of cocaine from Parcel 4 on May 7, 2018.

14. In February 2019, the Los Angeles Police Department (LAPD) started investigating a triple homicide. During the course of the investigation, REID was identified as a suspect.¹ In June 2019, state search and arrest warrants were executed for REID and his residence in

¹ REID was subsequently charged with three counts of homicide and is currently incarcerated and awaiting trial in California.

Randallstown, Maryland. During the search of REID's residence, USPIS recovered a total of \$27,779 in U.S. Currency, including: \$26,782 from a safe located in REID's bedroom, \$597 located in a wallet located in a second bedroom, and \$400 located in a drawer in the second bedroom.² Some of the currency was wrapped in green saran wrap with the number "10" written on the outside consistent with the previous currency seizure. In addition, from a utility room in REID's residence, USPIS seized 420 grams of N-Phenethyl-4-piperidinon (4-ANPP), which is a precursor for fentanyl. Law enforcement officers also seized various body armor, ammunition, firearms scopes and a black Taurus .357 Magnum revolver, as well as several electronic devices. LAPD detectives authored search warrants for the seized electronics devices.

15. Pursuant to a state search warrant, a forensics analysis was conducted on REID's electronic devices. A review of text messages between REID and PRIEST showed constant communication between the two on and around the dates of the seizures on April 20, April 23, and May 7, 2018. Based on my training, experience, knowledge of the investigation, and discussions with other investigators, I believe that REID and PRIEST were tracking and discussing the status of the seized money parcels (Parcels 1, 2 and 3) and cocaine parcel (Parcel 4) scheduled to arrive in Owings Mills, Maryland via USPS.

16. For example, on April 19, 2018, PRIEST sent a text to REID's phone stating "nothing." REID replied, "not yet say the same thing." On April 19, 2018, PRIEST texted REID, "nothing" and REID replied "U at office."

17. On April 20, 2018, PRIEST texted REID, "nothing!" On April 22, PRIEST texted REID, "Any update?" "I'm off tomorrow" to which REID replied "Yoo yea GD but no update."

² The \$27,779 in U.S. currency seized from REID's residence on June 5, 2019 (Asset ID 19-USP-001755) was administratively forfeited by UPSIS on October 14, 2020.

On April 26, 2018, REID texted PRIEST “Shorty coming” to which PRIEST replied “When??” REID texted “I’ll let u no for sure.”

18. On May 2, 2018, REID texted PRIEST “Keep eye open for her today” to which PRIEST replied “AAIIGGHT.” On May 3, 2018, REID texted PRIEST “Her hm girl mite come to lunch wit us tomorrow.” On May 4, 2018, REID texted PRIEST “U at da office working,” “You see shorty” to which PRIEST replied “NoOoOoPE.”

19. On May 5, 2018, REID texted PRIEST “U see shorty witda phat ass,” to which PRIEST responded “NoOoOoPE.” On May 10, 2018, PRIEST texted REID “YoOOoOOo... I’m not working today...but check and see if Shorty is here.”

20. On May 21, 2018, PRIEST texted REID “YoOOoOOo it’s some girls registering today...check shorty paperwork over again” to which REID replied “Her paperwork say da same look out for her jus in case.”

21. On March 17, 2020, together with Special Agent Joe Okronly of the USPS Office of Inspector General, I interviewed PRIEST regarding his involvement with trafficking illegal narcotics through the U.S. Mail. PRIEST confirmed he had been friends with REID since childhood. PRIEST admitted he provided REID addresses on his assigned postal route where REID could send parcels that PRIEST would intercept. PRIEST admitted to meeting REID on his route to pass the parcels off to REID and stated that REID would text him to inform him when to expect the parcels. PRIEST told investigators that he originally thought the parcels contained marijuana. On March 17, 2020, PRIEST was relieved of his duties and put on emergency placement. On April 14, 2020, PRIEST resigned from his employment with USPS.

Wage and Employment Records

22. On July 3, 2018, a check for wages and employment was conducted for REID, but no wages in the state of Maryland could be found since the second quarter of 2016.

Criminal History of Narcotics Offenses

23. A criminal history check of REID revealed that he has been convicted of at least the following criminal offenses:


Date of Arrest	Charge(s)	Location	Disposition	Federal/State
11/18/2006	CDS POSSESS WITH INTENT TO DIS	Baltimore, MD	Confinement: 1 Years Suspended: 1 Years Probation 2 Years Supervised Probation Definite	State
04/03/2017	FIREARM POSS W/FEL CONVICT CDS-POSS OF FIREARMS REG FIREARM: ILLEGAL POSSESSION HANDGUN ON PERSON	Annapolis, MD	Guilty (4 years 11 Months) Suspended (4 years 11 Months) Probation 2 Years Supervised Nolle Prosequi Nolle Prosequi Nolle Prosequi	State

Conclusion

24. The evidence in this declaration provides probable cause to believe, and I do believe, that the \$377,150.00 in U.S. Currency recovered from Parcels 1, 2 and 3 on April 20 and 23, 2018 constitutes: (1) moneys furnished or intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; or (3) moneys used or intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841(a)(1) and is forfeitable to the United States under 21 U.S.C. § 881(a)(6).

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 16 day of October 2020.


Christopher Johnson
U.S. Postal Inspector
United States Postal Inspection Service